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March 18, 2014

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**BY FEDERAL EXPRESS**

Hon. James C. Turk  
United States District Court for the  
Western District of Virginia  
246 Franklin Road S.W., Room 220  
Roanoke, Virginia 24011-2214

Re: *De'lonta v. Clarke*, No. 11-cv-00257

Dear Judge Turk:

This firm represents plaintiff Ophelia De'lonta in the above-mentioned case. We write on behalf of all parties.

On January 27, 2014, the parties filed a Rule 26(f) report which set forth a proposed case management schedule to govern discovery and the briefing of any summary judgment motions either party may wish to file. *See* Dkt. 101.

Since filing their Rule 26(f) report, the parties have conducted document discovery and have conferred regarding the scheduling of depositions and the exchange of expert disclosures, among other issues. Notwithstanding these good-faith efforts, the parties anticipate that they will be unable to complete discovery by April 4, 2014, as contemplated in the schedule proposed in the Rule 26(f) report, in part due to the availability of witnesses for deposition. Accordingly, the parties respectfully request that this Court modify the schedule set forth in the parties' Rule 26(f) report and adopt a scheduling order providing as follows:

- Deadline for completion of fact and expert discovery: May 16, 2014
- Motions for summary judgment due: June 13, 2014
- Opposition to motions for summary judgment due: July 11, 2014
- Replies in support of summary judgment due: August 1, 2014

A proposed order memorializing the parties' proposed schedule is enclosed for the Court's convenience.

Finally, the parties had initially informed the Court that they were available during the week of June 16, 2014 for a hearing on summary judgment motions. In view of the parties' proposal to move the schedule back, the parties now wish to inform the Court that they are available for a summary judgment hearing during the week of August 18 or the week of August 25.

WILMERHALE

Hon. James C. Turk  
March 18, 2014  
Page 2

All parties are, of course, available at the Court's convenience to discuss this or any other matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alan E. Schoenfeld', with a long horizontal stroke extending to the right.

Alan E. Schoenfeld

cc: J. Michael Parsons